
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

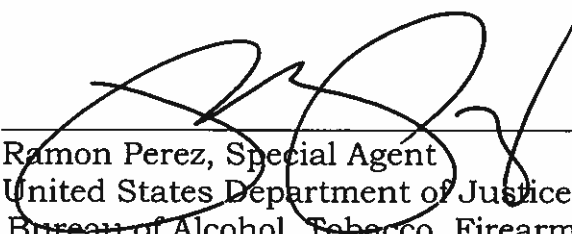
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Michael A. Hammer
 :
 DAYANA VALDERRAMA : Mag. No. 20-10084
 :

I, Ramon Perez, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B



Ramon Perez, Special Agent
United States Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence,
February 25, 2020, Essex County, New Jersey

Honorable Michael A. Hammer
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of a Firearm by a Convicted Felon)

On or about February 25, 2020, in Union County, the District of New Jersey and elsewhere, the defendant,

DAYANA VALDERRAMA,

knowing that she had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce three firearms and ammunition, namely 1) a Smith & Wesson handgun, bearing serial number HPA0885, 2) a Smith & Wesson handgun, bearing serial number UEA1615, and 3) a Ruger revolver, bearing serial number 57443042, and 305 rounds of assorted ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Ramon Perez, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of the evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged.

1. On or about February 25, 2020, members of ATF, with assistance from additional members of law enforcement, executed a search warrant at the residence of Dayana Valderrama ("Valderrama") in Rahway, New Jersey.

2. During the search of Valderrama's bedroom, law enforcement recovered a backpack which contained three firearms: 1) a loaded Smith & Wesson handgun, bearing serial number HPA0885, 2) a loaded Smith & Wesson handgun, bearing serial number UEA1615, and 3) a Ruger revolver, bearing serial number 57443042; and 305 total rounds of assorted ammunition.

3. The backpack containing the firearms and ammunition also contained documents addressed to and related to Valderrama.

4. Before being recovered in New Jersey on or about February 25, 2020, the three firearms moved in interstate commerce.

5. On or about October 4, 2019, Valderrama was convicted in the Superior Court of New Jersey, Essex County, of unlawful possession of a weapon, a handgun, in violation of N.J.S.A. 2C:39-5B, a crime punishable by imprisonment for a term exceeding one year, and she was sentenced to three years' probation.